UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA	§	
	§	Case No: 3:12-CR-317-L
v.	§	Case No: 3:13-CR-030-L
	§	Hon. Sam A. Lindsay
BARRETT LANCASTER BROWN	§	

UNOPPOSED MOTION TO WITHDRAW DEFENDANT'S MOTIONS TO DISMISS THE INDICTMENT

Defendant BARRETT LANCASTER BROWN moves to withdraw his Motion to Dismiss the Indictment in Case No. 12-CR-317 (Doc. 98) and Motion to Dismiss the Indictment in Case No. 13-CR-030 (Doc. 56). In support thereof, he would show the Court the following:

1. Mr. Brown filed his Motion to Dismiss Indictment Case No. 12-CR-317 (Doc. 98) on January 31, 2014.
2. Mr. Brown filed his Motion to Dismiss Indictment (Doc. 56) on March 3, 2014.
3. A Plea Agreement and Factual Resume were filed on April 2, 2014. *See* Case No. 12-CR-317 (Docs. 108–9).
4. A Rearraignment Hearing as to Mr. Brown was held on April 29, 2014.
5. In accordance with the Plea Agreement, and the interests of judicial economy, Mr. Brown has agreed to withdraw his Motion to Dismiss in Case No. 12-CR-317 (Doc. 98) and Motion to Dismiss in Case No. 13-CR-030 (Doc. 56).

WHEREFORE, PREMISES CONSIDERED, Mr. Brown asks the Court to enter an Order that withdraws his Motions to Dismiss the Indictment.

Respectfully submitted,

-s- *Ahmed Ghappour*
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CERTIFICATE OF CONFERENCE

I certify that pursuant to agreement with the government, memorialized in the plea agreements in both of the above cases, the government is unopposed to the relief requested.

/s/ Ahmed Ghappour
AHMED GHAPPOUR
/s/ Charles Swift
CHARLES SWIFT
/s/ Marlo P. Cadeddu
MARLO P. CADEDDU
Attorneys for Barrett Lancaster Brown

CERTIFICATE OF SERVICE

I certify that today, May 15, 2014, I filed the instant motion using the Northern District of Texas's electronic filing system (ECF) which will send a notice of filing to all counsel of record.

/s/ Ahmed Ghappour
AHMED GHAPPOUR
/s/ Charles Swift
CHARLES SWIFT
/s/ Marlo P. Cadeddu
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